

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

KYLE SLOAN, Individually, and as Personal Representative of the Estates of Rylie Sloan and Jamie Sloan, KYLE SLOAN as Surviving Spouse of Jamie Sloan, and KYLE SLOAN as Surviving Parent of Rylie Sloan; and SUSAN WEST, Individually; and as the next friend and natural guardian of K.W., a minor,

Plaintiffs,

v.

NICHOLAS BURIST; LOCKE RELOCATIONS LLC; UNIGROUP, C.A.; MAYFLOWER TRANSIT LLC; VANLINER INSURANCE COMPANY AND XYZ COMPANIES 1-3,

Defendants.

CASE NO: 2:22-cv-0076-LGW-BWC

**DEFENDANT MAYFLOWER TRANSIT, LLC'S UPDATE
REGARDING MEET AND CONFER ON OCTOBER 11, 2024**

In anticipation of the October 15, 2024 conference with the Court the parties conferred via zoom to discuss the pending discovery dispute. Mayflower updates the Court regarding three developments.

First, as the Court requested, Mayflower has reviewed the documents from Mayflower's privilege log. Of those documents, certain documents related to corporate organization that were logged as not responsive or irrelevant for the pending requests will now be produced. Entries 67, 70, 73, 112, 115, and 118 were withdrawn from the privilege log. Given the second requests for production, those documents will be produced as responsive to certain requests related to jurisdictional discovery.

Second, the remaining documents that contain financial information and attorney-client or work product information will be withheld for the reasons asserted in the privilege log.

Third, Mayflower and Plaintiffs have selected a date on which the parties and the witness are available for UniGroup C.A.'s corporate representative deposition relating to the jurisdiction motion filed by UniGroup, C.A..

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ Brighten Donner

Brantley C. Rowlen

Georgia Bar No. 153031

Brighten B. Donner

Georgia Bar No. 831804

Todd R. Ehrenreich

Admitted Pro Hac Vice

Jeffrey Geldens

Admitted Pro Hac Vice

24 Drayton St., Suite 300

Savannah, GA 31401

Tel. (912) 525-4960

Brantley.Rowlen@lewisbrisbois.com

Brighten.Donner@lewisbrisbois.com

Todd.Ehrenreich@lewisbrisbois.com

Jeffrey.Geldens@lewisbrisbois.com

Counsel for Mayflower Transit, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

KYLE SLOAN, Individually, and as Personal Representative of the Estates of Rylie Sloan and Jamie Sloan, KYLE SLOAN as Surviving Spouse of Jamie Sloan, and KYLE SLOAN as Surviving Parent of Rylie Sloan; and SUSAN WEST, Individually; and as the next friend and natural guardian of K.W., a minor,

Plaintiffs,

v.

NICHOLAS BURIST; LOCKE RELOCATIONS LLC; UNIGROUP, C.A.; MAYFLOWER TRANSIT LLC; VANLINER INSURANCE COMPANY AND XYZ COMPANIES 1-3,

Defendants.

CASE NO: 2:22-cv-0076-LGW-BWC

CERTIFICATE OF SERVICE

I CERTIFY that on OCTOBER 11, 2024, I e-filed the foregoing via the CM/ECF electronic filing system, which will automatically serve copies on all counsel of record.

This the 11th day of October, 2024.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ Brighten B. Donner
Brantley C. Rowlen
Georgia Bar No. 153031
Brighten B. Donner
Georgia Bar No. 831804
Todd R. Ehrenreich
Admitted Pro Hac Vice
Jeffrey Geldens
Admitted Pro Hac Vice
24 Drayton St., Suite 300
Savannah, GA 31401
Tel. (912) 525-4960

Brantley.rowlen@lewisbrisbois.com
Brighten.Donner@lewisbrisbois.com
Todd.Ehnrenreich@lewisbrisbois.com
Jeffrey.Geldens@lewisbrisbois.com

Counsel for Mayflower Transit, LLC